FILED

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS EL PASO DIVISION

CLERK. US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,	§ BY
Plaintiff,	§ Case No. EP: 23-CR-02512-KC
	§ INFORMATION
v.	§
YOSELLYN ORTIZ,	§ CT 1: 18 U.S.C. § 932(b)(1) and (c)(1)) –
	§ Straw Purchasing of Firearms for or on
Defendant.	§ behalf of a Prohibited Person §

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(18 U.S.C. § 932(b)(1) and (c)(1)) – Straw Purchasing of Firearms)

Beginning on or about October 6, 2023, and continuing until on or about October 18, 2023, in the Western District of Texas, Defendant,

YOSELLYN ORTIZ,

did knowingly purchase firearms, to wit:

- (1) a Glock, model 17, 9mm handgun;
- (2) a Glock, model 44, .22 caliber handgun;
- (3) an Umarex/Beretta, model 92FSR, .22 caliber handgun;
- (4) a Glock, model 43X, 9mm handgun;
- (5) a Glock, model G48 MOS, 9mm handgun;
- (6) a Glock, model 17, 9mm handgun;
- (7) a Glock, model 17Gen3, 9mm handgun;
- (8) a Glock, model 17Gen4, 9mm handgun;
- (9) a Taurus, model TX22, .22 caliber handgun;
- (10) a Glock, model 44, .22 caliber handgun;

- (11) a Smith & Wesson, model M&P9, 9mm handgun;
- (12) a Smith & Wesson, model M&P9, 9mm handgun;
- (13) a Glock, model G44, .22 caliber handgun;
- (14) a Glock, model 43X, 9mm handgun; and
- (15) a Glock, model 44, .22 caliber handgun;

in or otherwise affecting interstate or foreign commerce, for, on behalf of, or at the request or demand of RAUL MANUEL CHAVEZ, knowing or having reasonable cause to believe that RAUL MANUEL CHAVEZ had previously been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year; or did conspire to do so, in violation of Title 18, United States Code, Section 932(b)(1) and (c)(1)).

Respectfully submitted,

JAIME ESPARZA UNITED STATES ATTORNEY

By:

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